


EXHIBIT 3

UNITED STATES DISTRICT COURT

for the

Northern District of California 

Brand Little, et al.

*Plaintiff*v.
Pacific Seafood Procurement, LLC, et al.*Defendant*

Civil Action No. 23-cv-1098

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTIONTo: Verizon Wireless, Attn: VSAT
180 Washington Valley Road, Bedminster, NJ 07921; via facsimile: 1.888.667.0028*(Name of person to whom this subpoena is directed)*

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material.
See Schedule A

Place: Gross Klein PC
The Embarcadero, Pier 9, Suite 100
San Francisco, CA 94111

Date and Time:

September 22, 10:00 a.m.

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 8/22/2025

CLERK OF COURT

OR

*Signature of Clerk or Deputy Clerk*

Stuart G. Gross

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* Plaintiffs
Brand Little and Robin Burns, who issues or requests this subpoena, are:
Stuart G. Gross, The Embarcadero, Pier 9, Ste 100, S.F., CA 94111, sgross@grosskleinlaw.com (415) 671-4628

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 23-cv-1098

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* _____
 on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
 \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)**(c) Place of Compliance.**

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

Verizon Wireless

SCHEDULE A

I. DEFINITIONS

As used in the Requests herein, the following terms shall have the definitions and constructions listed below. Terms not defined shall have the meanings assigned to them, if any, by the Federal Rules of Civil Procedure and or Local Rules.

1. The terms “**You**” and “**Your**,” including its possessive, refer to Verizon Wireless, and any predecessors, successors, subsidiaries, departments, divisions, affiliates, and any organization or entity which the responding person or entity manages, controls, and any organization or entity which the responding person or entity manages, controls, or has an ownership interest in, or did manage, control or have an ownership interest in, as well as all current and former directors, officers, employees, agents, representatives or any persons acting or purporting to act on behalf of the responding person or entity.

2. The term “**Document**” is defined to be synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Fed. R. Civ. Pro. 34(a)(1)(A). Documents include Communications.

3. The term “**Communication**” means the transmission or transfer of information of any kind, orally, in writing, electronically, or in any other manner, at any time or place, and under any circumstances whatsoever. Communication includes, without limitation, emails, text messages, voice records, etc.

4. The term “**Concerning**” means relating to, referring to, applicable to, describing, evidencing or constituting.

5. References to the singular include the plural, and plural includes the singular.

6. The use of any tense of any verb shall be considered also to include within its meaning all other tenses of the verb so used.

7. The use of the disjunctive form, *e.g.* “or,” shall be considered to also include within its meaning the conjunctive form, *e.g.* “and,” and vice versa.

8. “**All**” should be construed to include the collective as well as the singular and shall mean “each,” “any,” and “every.”

9. “**Including**” shall be construed to mean “without limitation.” “Including” is used to emphasize certain types of documents requested and should not be construed as limiting the request, or any other request, in any way.

INSTRUCTIONS

1. The requested phone records should be produced in an electronic format such as .xls or .csv, separated by the phone numbers of the associated phone records, with the records for each such phone number contained in a separate file or as separate tabs in a single file.

2. All of the requested phone records, regardless of date, should be produced to the extent they exist.

3. If any documents requested herein have been lost or destroyed, the documents so lost or destroyed shall be identified, and the reasons why the documents were lost or destroyed shall be explained with sufficient particularity.

4. If You object to part of any Request, please state the objection and the basis of the objection, including citations to relevant authority, as appropriate, and furnish documents responsive to the remainder of the Request.

5. All documents or portion of documents called for by these Requests, for which You claim a privilege, statutory authority, or regulatory authority as a ground for nonproduction shall be identified in a privilege log containing information sufficient to evaluate the claimed privilege or authority.

6. If anything is deleted or redacted from a document produced, please state: the reason for the deletion; the subject matter of the deletion; and the name of the person or persons who decided to delete such matter.

7. These Requests are continuing in nature; if, after responding, You obtain or become aware of any further information or documents responsive to these Requests, a supplementary answer and/or production is required. Fed. R. Civ. P. 26(c).

8. If You have any questions or concerns regarding these instructions or how to respond to these requests, Your or Your attorney should contact Plaintiffs' counsel at the email address or phone number immediately.

9. If it would be helpful to receive the table of phone numbers and names contained in Request 1 in excel format, please contact Ian Atkinson-Young at iatkinsonyoung@grosskleinlaw.com.

10. Please produce each and all of the documents requested herein on or before the date indicated in the subpoena to which this schedule is attached by delivering true and correct copies of such documents by delivery of the appropriate media containing the documents to Stuart G. Gross, Gross & Klein PC, The Embarcadero, Pier 9, Suite 100, San Francisco, CA 94111, or, if via email or another form of electronic transfer, to sgross@grosskleinlaw.com and iatkinsonyoung@grosskleinlaw.com.

DOCUMENTS TO BE PRODUCED

REQUEST FOR PRODUCTION NO. 1:

Records of all call and text message activity (including SMS and MMS communications), both incoming and outgoing, including, without limitation, time and date, duration, and origin and destination number, for the following timeframe of August 21, 2015 through August 21, 2025, for the following cellular telephone numbers:

	Phone number(s)
1	(206) 499-6988
2	(415) 673-5868
3	(415) 509-4855
4	(415) 860-1256
5	(707) 318-5286
6	(541) 531-1827

7	(360) 739-0378
8	(360) 244-2175
9	(707) 272-3241
10	(415) 310-1547
11	707-845-2232
12	707-367-1715
13	707-951-0989
14	510-780-6612
15	707-272-0405
16	707-339-6011
17	(503) 381-7596
18	(503) 707-2974
19	(253) 203-4351
20	(360) 970-3311
21	(253) 777-5889
22	541-260-1732
23	(360) 480-1992
24	707-951-7191
25	(650) 383-8999
26	(831) 760-0042
27	(626) 215-7663
28	(218) 888-9999
29	(415) 992-9999
30	0909028999
31	(650) 669-8999
32	(408) 904-8818
33	(510) 634-0473
34	(707) 465-3911
35	(541) 404-8703
36	(541) 297-9782
37	(541) 373-2140
38	(707) 495-6637
39	(541) 888-6814
40	(541) 888-3253
41	(541) 404-8702
42	(415) 517-6045
43	(626) 448-9222
44	(541) 961-7209
45	(808) 936-7052

46	(831) 601-3738
47	(707) 339-6011
48	(415) 409-3474
49	(650) 245-7965
50	(510) 816-8333
51	(510) 532-7823
52	(510) 532-7821
53	707-951-3704
54	(707) 875-3522
55	(707) 292-0302
56	(707) 357-0518
57	(707) 357-4519
58	360-580-6453
59	(360) 591-2107
60	360-580-6872
61	(206) 947-9250
62	(360) 310-0662
63	(626) 347-8479
64	(206) 612-0558
65	(425) 466-1669
66	(360) 927-8543
67	(503) 836-2975
68	(425) 753-3567
69	(425) 802-2628
70	(971) 666-0051
71	(360) 310-0158
72	(707) 458-8464
73	(971) 418-1524
74	(541) 808-4728
75	(209) 401-1905
76	(707) 480-4159
77	(503) 905-4517
78	(503) 706-8339
79	(503) 830-0014
80	(916) 824-5139
81	(415) 254-3348
82	(916) 283-9535
83	(541) 961-5493
84	(971) 285-2238

85	(971) 395-9712
86	971-242-9450
87	(510) 677-9630
88	(916) 997-2832
89	(707) 498-1119
90	(707) 498-1384
91	(503) 819-8241
92	(503) 905-4512
93	(503) 905-4500
94	(415) 310-4449
95	(415) 760-8383
96	(415) 760-8239
97	(415) 717-0833
98	(415) 205-8206
99	(510) 828-2378
100	(510) 274-7830
101	(415) 298-1677
102	(510) 604-2299
103	(360) 214-0192
104	(415) 810-1351
105	(408) 690-0201
106	(415) 244-6761
107	(415) 350-5139
108	(360) 484-6022
109	(503) 741-0142
110	(707) 360-1239
111	(707) 218-8375
112	(360) 214-8118
113	(559) 690-8742
114	(360) 214-4354
115	(424) 450-9668
116	(541) 270-5365
117	415-279-1894
118	707-919-2370
119	(360) 581-2669
120	(707) 362-0606
121	(323) 842-7197
122	(323) 262-8222
123	(323) 263-2321

124	(213) 300-0075
125	707-953-7743
126	707-875-9472
127	(650) 740-0362
128	(707) 834-2241
129	(707) 499-5503
130	(415) 823-1464
131	(541) 961-9928
132	(707) 840-9116
133	(707) 839-7012
134	(707) 839-3260
135	(707) 845-1248
136	(707) 441-6083
137	(503) 313-0714
138	(541) 961-4602
139	(707) 964-6368
140	(707) 372-9996
141	(503) 313-0714
142	(541) 961-4602
143	(415) 307-7649
144	(415) 279-5857
145	(415) 713-0756
146	(604) 657-6106
147	(831) 901-9137
148	(415) 320-5120
149	(510) 514-4073
150	(415) 505-3288
151	(415) 517-6793
152	(415) 370-3584
153	(415) 794-9619
154	(415) 819-0756
155	(503) 939-1991
156	(503) 224-1611
157	(925) 285-4726
158	(425) 443-2275
159	(415) 746-0170
160	(360) 244-5060
161	(310) 621-2939
162	(310) 886-7924

163	(707) 570-9972
164	(707) 280-1168
165	(907) 738-7278
166	(408) 603-0022
167	(831) 588-3214
168	(702) 353-6714
169	(510) 981-9741
170	(360) 589-4260
171	(360) 268-0133
172	(360) 581-0982
173	(360) 268-0133
174	(707) 357-4529
175	(360) 268-9319
176	(360) 268-9358
177	(360) 790-7444
178	886 929-128-609
179	(503) 325-1461
180	(503) 325-1462
181	(503) 325-5252
182	(503) 325-0403
183	(503) 440-0119
184	(415) 813-0042
185	(415) 671-2888
186	(707) 954-0330
187	(425) 698-3460
188	(360) 583-9825
189	(360) 924-1687
190	(541) 574-2698
191	(360) 208-6570
192	(360) 875-6570
193	(360) 875-6582
194	(707) 496-8312
195	(360) 875-6570
196	(360) 875-6582
197	(805) 698-8262
198	(805) 388-0484
199	(805) 435-0484
200	(415) 756-7839
201	(360) 941-0357

202	(360) 268-0310
203	(360) 581-0708
204	(360) 820-2784
205	(206) 302-9722
206	(619) 933-9176